



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

MAY 13 2010

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Pamela Mull
Vice President and General Counsel
Potlatch Corporation
601 West First Avenue, Suite 1600
Spokane, Washington 99201

Re: Engineering Evaluation/Cost Analysis, Biological Assessment and Cultural Resources
Evaluation Reports for the Avery Landing Site

Dear Ms. Mull:

On March 25, 2010, counsel for Potlatch Corporation and Potlatch Forest Products Corporation (together referred to as "Potlatch") was informed that the United States Environmental Protection Agency (EPA) would complete the Engineering Evaluation/Cost Analysis (EE/CA), Biological Assessment (BA), and Cultural Resources Evaluation (CRE) reports for the Avery Landing Site. Following a careful and thorough review of the EE/CA and CRE draft reports which were prepared and submitted by Potlatch, it was determined that the deficiencies in these drafts could best be corrected by having EPA produce the final reports, along with the BA report when appropriate.

The deficiencies associated with the draft EE/CA report are summarized as follows:

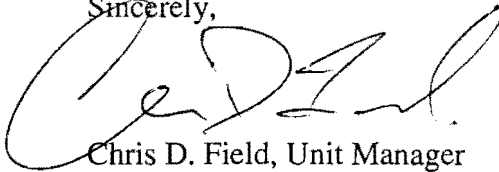
- The site description does not include sufficient current and historical information necessary to convey a clear understanding of the physical, demographic, and other characteristics of the site and surrounding areas; including a thorough discussion of the site description, site background, and previous removal actions.
- The discussion of the contaminants of potential concern (COPC) does not provide a clear and justifiable rationale for elimination of chemicals from further consideration when they are present at concentrations that exceed screening concentrations. The COPC process is not consistent with the non-time-critical removal streamlined risk evaluation process and EPA risk assessment guidance. The conceptual site model does not provide adequate depictions of analyte migration pathways, and assumptions for complete/incomplete exposure pathways are not supported.
- A meaningful and substantive foundation for the scope and objectives of the removal action, along with the identification and evaluation of removal action alternatives, is

deficient because the nature and extent of contamination and streamlined risk evaluation are deficient as noted above.

- The discussion of removal action alternatives is not limited to only two or three of the most qualified technologies that apply to media or source of contamination; rather, seven alternatives are presented with little or no rational or appreciable basis for distinction, definition, and evaluation. The rationale for selection of the preferred alternative has no merit; in particular, the recommended alternative does not meet the threshold criteria of overall protective of human health and the environment and compliance with ARARs.

Lastly, please be aware that while Potlatch has been relieved of the obligation to provide the reports described above, all remaining requirements of the Administrative Settlement Agreement and Order on Consent in docket number CERCLA-10-2008-0135 remain in full force and effect.

Sincerely,

A handwritten signature in black ink, appearing to read "C. D. Field", written over the typed name.

Chris D. Field, Unit Manager
Emergency Response Unit

cc: Terry Cundy, Potlatch
Kevin Beaton, Esq.
Dan Redline, Idaho DEQ
Earl Liverman, EPA
Richard Mednick, EPA